

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

*IN RE USAA DATA SECURITY
LITIGATION*

Case No. 7:21-cv-05813-VB

**UNITED SERVICES AUTOMOBILE ASSOCIATION'S
NOTICE OF MOTION TO DISMISS PURSUANT TO RULES 12(B)(1) AND (B)(6)**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jason Beach, executed February 18, 2022, with exhibit annexed thereto, and the accompanying Memorandum of Law, Defendant, United Services Automobile Association, respectfully moves this Court for an Order dismissing the operative Complaint pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).

Dated: February 18, 2022

Respectfully Submitted,

/s/ Armin Ghiam

Armin Ghiam

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USAA

CERTIFICATE OF SERVICE

I hereby certify that, on February 18, 2022 I filed a true and correct copy of the foregoing document via the Court's electronic-filing system, which will send electronic notification of such filing to all counsel-of-record in this action.

/s/ Armin Ghiam
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